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and Damien Ding

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

ARIEL ABITTAN,

Plaintiff,

v.

LILY CHAO et al.,

Defendants.

Case No. 20-CV-09340-NC

**O'SHAUGHNESSY DECLARATION RE:
DISCOVERY DISPUTE ABOUT LAW
FIRM SUBPOENAS**

Judge: Hon. Nathanael Cousins

Filed: December 24, 2020

O'SHAUGHNESSY DECLARATION RE:
DISCOVERY DISPUTE ABOUT LAW FIRM SUBPOENAS

DECLARATION

I, Patrick E. O'Shaughnessy, declare,

1. I am attorney licensed to practice law in California, the District of Columbia, and Ohio. I serve as Of Counsel at SAC Attorneys LLP, counsel for Plaintiffs and Cross-Defendants in the above-captioned matter. I submit this Declaration Re: Discovery Dispute About Law Firm Subpoenas (the "Discovery Dispute"). I have personal knowledge of the facts set forth herein and, if called as a witness, could and would competently testify thereto.

2. A true and correct copy of a subpoena at issue in this discovery dispute in the above-captioned lawsuit is attached as Exhibit 1.

3. Plaintiff sent copies of Exhibit 1 to non-party Fenwick & West and our law firm.

4. Plaintiff also sent subpoenas with effectively the same substantive words as Exhibit 1 to several other non-party law firms as well as copies of those subpoenas to our law firm.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: June 9, 2023

SAC ATTORNEYS LLP

/s/ Patrick O'Shaughnessy

Patrick O'Shaughnessy
Attorney Defendants